

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**MEXICAN AMERICAN
LEGISLATIVE CAUSUS, TEXAS HOUSE OF
REPRESENTATIVES (MALC)**

PLAINTIFFS,

V.

**STATE OF TEXAS; RICK PERRY, In His Official
Capacity as Governor of Texas; DAVID DEWHURST,
In His Official Capacity as Lieutenant Governor of
the State of Texas, and JOE STRAUS, In His Capacity
as Speaker of the House of Representative**

DEFENDANTS,

V.

**LEAGUE OF UNITED LATIN AMERICAN
CITIZENS (LULAC), Its Texas Districts and
Members, including Gabriel Y. Rosales, Belen Robles,
Ray Velarde, Johnny Villastrigo, Bertha Urteaga,
Baldomero Garza, Marcelo Tafolla, Raul Villaronga,
Asenet T. Armadillo, Elvira Rios, and Patricia Mancha
and Unnamed Members in Texas**

PLAINTIFF-INTERVENORS.

**§ CIVIL ACTION NO:
§ SA-11-CA-360-OLG-JES-XR
§ (Lead Case)**

**§ CIVIL ACTION NO.
§ SA-11-CA-361-OLG-JES-XR
§ (Consolidated case)**

**§ CIVIL ACTION NO.
§ SA-11-CA-490-OLG-JES-XR
§ (Consolidated case)**

LULAC's PROPOSED EXHIBIT & WITNESS LIST

TO THE HONORABLE THREE JUDDGE FEDERAL PANEL:

Comes now LEAGUE OF UNITED LATIN AMERICAN CITIZENS (LULAC), pursuant to this Courts Order and files their Proposed Exhibit, Witness and Expert Witness List.

Proposed Exhibit List

1. A series of maps and charts relating to the Congressional Redistricting for
 - a. Dallas County and Tarrant County area graphically and numerically demonstrating cracking and packing in the Congressional Plan.
 - b. Harris County Area graphically and numerically demonstrating cracking and packing in the Congressional Plan and the State House Plan.

- c. South Texas/Bexar County area graphically and numerically demonstrating cracking and packing in the Congressional and State Legislative Districts Plan.
- d. Travis County area graphically and numerically demonstrating cracking and packing in the Congressional Plan.
2. Analysis of the total number of voting precincts split by
 - a. Congressional redistricting plan.
 - b. State House of Representatives redistricting plan
3. A series of alternative redistricting plans for various areas of the state.
 - a. Central Texas Congress
 - b. Dallas and Tarrant County Congress.
 - c. Harris County Area Congress
 - d. Harris County area state house 24 district plan.
 - e. South Texas and Nueces County area.
 - f. Bell County area.
4. Series of Charts detailing growth of Texas and specified counties and areas for period 1970-2010.
5. A series of charts detailing socio-economic factors.
6. A series of charts detailing the 1981, 1991 and 2001 redistricting plans.

Proposed Witness List :

1. In the event we are unable to stipulate to the introduction of data taken from the Legislative Council and or other state agency and or their computer systems we will offer a witness or witnesses to prove them up.
2. Judge David Saucedo, County Judge of Maverick County, 500 Quarry Street, Suite 3, Eagle Pass, TX 78852, (830) 773-3824. He will testify concerning problems faced by his county as a result of the Congressional redistricting.
3. Congressman Ciro Davis Rodriguez, 9549 U.S. Hwy 181 South, San Antonio, Texas 78223. He will testify as to the existence of racially polarized voting, the splitting of communities of political, educational and ethnic interest. He will also testify concerning differences in educational, employment income and other issues related to voting. He will testify about the costs associated with multiple media markets.
4. Jesse Jay Alaniz, Harlandale I.S.D. Trustee, 1211 Vickers Ave., San Antonio, Texas 78211. He will testify as to the existence of racially polarized voting and the splitting of community of political, educational and ethnic interest by separating the Harlandale community and connecting it to Austin.

5. Baldomar Garza, LULAC National VP of the Southwest, 6502 Sterling Canyon, Katy, Texas 77450. He will testify as to the existence of racially polarized voting and the splitting of communities of political, educational and ethnic interest in Harris / Ft. Bend county area.

Proposed Expert List

1. George J. Korbel, 220 Garden View, San Antonio, TX 78213. George J. Korbel is an attorney and associate professor of political science at the University of Texas at San Antonio. George has testified as an expert witness in prior cases. George will testify to the following: (1) the Cracking and Packing of districts in both the State House of Representatives and the U.S. Congress. (2) Alternative plans which could have been drawn by the State of Texas in both the State House of Representatives and the U.S. Congress. (3) the functioning of the State computer system used in the redistricting process. (4) the social economic differences between Latinos and other racial groups compared to the white Anglo race. (5) may also testify as to racial polarized voting.

2. LULAC will also utilize both Plaintiffs and Defendants experts during cross-examination in its claim for relief.

Respectfully submitted,

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and Associates
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By: 

Luis Roberto Vera, Jr.
State Bar No. 20546740

ATTORNEY FOR PLAINTIFF-INTERVENORS

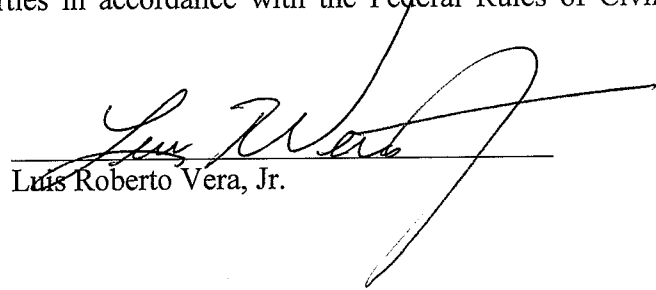
VERIFICATION

"My name is Luis Roberto Vera, Jr. I have read the Lulac's Proposed Exhibit & Witness List and every statement are within my personal knowledge and are true and correct."


Luis Roberto Vera, Jr.

CERTIFICATE OF SERVICE

This is to certify that on August 1, 2011, a true and correct copy of the above and foregoing document was served on all parties in accordance with the Federal Rules of Civil Procedure.


Luis Roberto Vera, Jr.